

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

SAVE RGV,

Plaintiff,

v.

SPACE EXPLORATION TECHNOLOGIES
CORP.,
Defendant.

Civil Action No.1:24-cv-00148

SUPPLEMENTAL DECLARATION OF CAROLYN WOOD

I, Carolyn Wood, declare as follows:

1. I am over the age of 18, of sound mind, and if called upon, could testify under oath as to the following.

2. I make this Supplemental Declaration in support of Plaintiff SpaceX's Sur-reply in Opposition to Save RGV's Motion. I also made a Declaration earlier in the case. In this Supplemental Declaration I will not repeat statements that I made in my first Declaration.

3. I am personally involved in SpaceX's application for an individual TPDES permit from TCEQ, including the draft permit that TCEQ has issued to SpaceX and that TCEQ has made available to the public.

4. The draft permit contains permit conditions that require SpaceX to monitor and report to TCEQ the results of its sampling of the deluge water. The draft permit also contains effluent limits that SpaceX must follow, including effluent limits called "daily maximum limits." The draft permit does not contain daily maximum limits for Total Copper, Total Mercury, Total Zinc, and Chromium (hexavalent). However, I examined the lab samples for deluge water for

Flight 5 and compared it against published TCEQ daily maximum limits for those metals. The lab samples for Flight 5 were all below those published daily maximum limits:

Bases for Plaintiff's Claims of Irreparable Harm	TCEQ Daily Max Effluent Limit	Lab Results from Flight 5
Total Copper	8 ug/L	7.6 ug/L
Total Zinc	189 ug/L	139 ug/L
Total Mercury	2.08 ug/L	Non-detect, lower than what is detected per the reporting limit
Chromium (hexavalent)	94 ug/L	28.9 ug/L

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of November 2024, in Boca Chica, Texas.



Carolyn Wood